Application Serial No.: 10/743,809

REMARKS

Applicants gratefully acknowledge the indication that Claims 3-9 and 14-17 contain allowable subject matter (page 3, numbered paragraph 6 of the Official Action). Claims 3, 7, 8, 9 and 14, however, were rewritten in independent form in the Amendment filed on January 6, 2006. Additionally, Claims 4-6, 16 and 17 depend either directly or indirectly from Claim 3 and Claim 15 depends from Claim 14. Accordingly, it is respectfully submitted that Claims 3-9 and 14-17 are allowable.

The Official Action states that, in the amendment filed on February 13, 2006,
Claim 1 is indicated as being "Previously Presented" and is different than the version
originally filed. According to the Official Action, the rejection is therefore based on
original Claim 1. The amendment filed on February 13, 2006, however, is *supplemental*to the amendment filed on January 6, 2006. In the amendment filed on January 6, 2006,
Claim 1 was amended to contain the changes which appear in the claim listing of
February 13, 2006. Accordingly, Claim 1 is properly listed as being "Previously
Presented" in the amendment filed on February 13, 2006. In addition, the amended
version of Claim 1 appearing in the Supplemental Amendment filed on February 13,
2006 is the current version of Claim 1 which should be used for examination purposes.

Claims 1 and 2 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 4,374,066 to Crivello (hereinafter referred to as "Crivello"). This rejection is respectfully traversed.

The Official Action is relying upon the disclosure in Crivello of a compound having the following structure:

Application Serial No.: 10/743,809

This compound, however, corresponds to formula (1) of Claim 1 only when the substituent "P" in formula (1) is a moiety having the following structure:

As defined in Claim 1, however, the substituent "P" is represented by $-O-SO_2R^1$, $-O-SO_2R^2$ or $-SO_2R^3$. The moiety set forth above does not correspond to any of these formulae. Accordingly, it is respectfully submitted that <u>Crivello</u> does not anticipate Claim 1. Claim 2 depends from Claim 1 and is therefore also not anticipated by <u>Crivello</u> for at least the reasons set forth above with respect to Claim 1. Reconsideration and withdrawal of this rejection is therefore respectfully requested.

New Claims 19 -21 were added in the Amendment filed on January 6, 2006.

These claims, which were not addressed in the Official Action, are also patentable over the references of record. In particular, Claim 19 is directed to onium salt compounds as set forth in original Claim 1 wherein, when A is a sulfur atom, m is 2 or 3 and n is 0 or 1. The compounds relied upon in the Official Action have only a single Ar¹ group (i.e., m=1 for both of these compounds). Accordingly, it is respectfully submitted that Claim 19 is patentable over the cited references. New Claim 20 is directed to onium salt compounds having a cation moiety selected from the group consisting of:

Application Serial No.: 10/743,809

$$S^{+}$$
 SO_{2} CH_{3}

; and

These compounds, which are disclosed in the specification as formulae (1-16), (1-19) and (1-21), respectively, meet the limitations of formula (1) of Claim 1 wherein P is an $-SO_2R^3$ group and R^3 is an aromatic group. It is respectfully submitted that these compounds are not disclosed in or suggested by the cited references and are therefore also patentable over the cited references. Claim 21 depends from Claim 20 and is therefore also patentable over the cited references.

4

CONCLUSION

In view of the above remarks, Applicants respectfully request a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

Respectfully submitted,

MERCHANT & GOULD P.C.

July 26, 2006

Date

Steven B. Kelber Registration No. 30,073

P.O. Box 2903 Minneapolis, Minnesota 55402-0903 Telephone No. (202) 326-0300 Facsimile No. (202) 326-0778

Ò

Christopher W. Raimund Registration No. 47,258

Patent & Trademark Office